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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., and HENDRINA VIVAS
CASTILLO,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-CV-01766-EMC

**DECLARATION OF AHILAN T.
ARULANANTHAM IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION FOR ORDER SHORTENING
TIME AND SETTING SCHEDULE**

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1 I, Ahilan T. Arulanantham, declare as follows:

2 1. I am an attorney at law duly licensed and entitled to practice in the State of
3 California. I am a Professor from Practice and Faculty Co-Director at the Center for Immigration
4 Law and Policy (CILP) UCLA School of Law, counsel of record in this action for Plaintiffs. I have
5 personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and
6 would testify competently thereto.

7 2. I file this Declaration in support of the Plaintiffs' Administrative Motion for Order
8 Shortening Time and Setting Schedule ("Motion").

9 3. This matter pertains to the Department of Homeland Security's decision to "vacate"
10 the January 17, 2025 extension of Temporary Protected Status ("TPS") for Venezuela and replace it
11 with a termination. The termination will go into effect on April 3, 2025, when employment
12 authorization documents for nearly 350,000 Venezuelan TPS holders who initially registered for
13 TPS under Venezuela's 2023 designation will expire; those TPS holders will become subject to
14 deportation on April 8, 2025.

15 4. As explained in the Motion to which this Declaration is attached, Plaintiffs contend
16 that thousands of Venezuelan TPS holders, along with their families, employers, and broader
17 communities, are suffering irreparable economic and psychological harm due to their imminent loss
18 of employment authorization and immigration status. Plaintiffs contend that immediate relief is
19 necessary to prevent this substantial and irreparable harm.

20 5. Plaintiffs have moved expeditiously to prepare this lawsuit and the Motion to
21 Postpone Effective Date of Effective Action ("Motion to Postpone") Defendants' actions. Plaintiffs
22 filed the Complaint on February 19, 2025—just over two weeks after they learned of the first of the
23 orders challenged here. Plaintiffs filed the Motion to Postpone the next day, on February 20, 2025.

24 6. On February 21, 2025, I emailed counsel for Defendants and proposed an expedited
25 schedule for the Motion to Postpone. On February 24, 2025, counsel for Defendants indicated that
26 they could not agree to any expedited briefing or hearing schedule. *See Exhibit 1.*

27 I declare under penalty of perjury under the laws of the United States of America that the
28

1 foregoing is true and correct.

2
3 Executed this 24th day of February 2025, in Los Angeles, California.

4
5 /s/ Ahilan T. Arulanantham
Ahilan T. Arulanantham